

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	)	<b>Bankruptcy No. 19-23079-JAD</b>
<b>ANGELA M. SIMONE,</b>	)	
<b>aka ANGELA MAMMARELLI SIMONE)</b>	<b>Chapter 13</b>	
<b>dba VICTOR VICTORIA HAIR ETC.</b>	)	
	)	
<b>Debtor(s)</b>	)	<b>Doc. No. _____</b>
	)	
<b>ANGELA M. SIMONE,</b>	)	
<b>aka ANGELA MAMMARELLI SIMONE)</b>		
	)	
<b>Movant(s)</b>	)	
	)	
<b>v.</b>	)	
<b>No Respondents</b>	)	

**APPLICATION TO APPROVE RETENTION OF REALTOR/BROKER**

AND NOW comes, Angela M. Simone, by and through her counsel, Jeffrey J. Sikirica, Esquire, and hereby moves for authorization to employ Donna Fischer and Coldwell Banker as real estate broker to sell certain real estate of Angela M. Simone, stating in support thereof as follows:

1. Angela M. Simone (hereinafter "Debtor") commenced this case by filing a Voluntary Petition for Relief under Chapter 13 of the United States Bankruptcy Code on August 3, 2019.
2. Debtor wishes to employ Donna Fischer and Coldwell Banker as real estate broker to sell 1030 Meridian Drive, Presto, PA 15142 (hereinafter the "Real Estate").
3. Debtor wishes to compensate Donna Fischer and Coldwell Banker, a broker commission of Five Percent (5%) of the gross selling price.
4. Debtor has selected Donna Fischer and Coldwell Banker for the reason that said real estate broker has considerable experience in matters related to the marketing and selling of real estate.

5. To the best of Debtor's knowledge, Donna Fischer and Coldwell Banker do not have any connection with the Debtor, the Debtor's creditors or any party in interest, or his respective attorneys.

6. Based on the "Verification of Realtor/Broker" and "Realtor/Broker Statement and Disclosure of Compensation", which are attached hereto as Exhibit "A", Debtor believes that Donna Fischer and Coldwell Banker do not represent any interest adverse to the Debtor or the Debtor's Chapter 13 Bankruptcy Estate in the matters upon which Donna Fischer and Coldwell Banker are to be engaged, and that Donna Fischer and Coldwell Banker's employment will be in the best interest of the Debtor's Chapter 13 Bankruptcy Estate.

WHEREFORE, Debtor respectfully prays this Honorable Court that the Debtor be granted authorization to employ Donna Fischer and Coldwell Banker as real estate broker to sell the Real Estate of the Debtor on behalf of the Debtor's Chapter 13 Bankruptcy Estate and for such other relief that is just and proper.

March 3, 2020

Respectfully submitted,

/s/ Jeffrey J. Sikirica  
Jeffrey J. Sikirica, Esquire  
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